



Corelle Brands LLC f/k/a Instant Brands, LLC (“**Instant Brands**”).<sup>2</sup> In support thereof, Elijah states as follows:

1. On June 12, 2023 (the “**Petition Date**”), the above-captioned debtors (collectively, the “**Debtors**”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas.

2. Elijah provides services to Instant Brands pursuant to a Preferred Provider Agreement dated December 1, 2021 (the “**Agreement**”), pursuant to which Elijah provides certain digital forensics and eDiscovery services. A true and correct copy of the Agreement is attached as **Exhibit 1**.

3. Instant Brands owes \$299,380.47 in administrative expenses for post-petition services provided by Elijah to Instant Brands. Those services are evidenced by the outstanding invoices (the “Invoices”) attached hereto as **Exhibit 2**.

4. Elijah asserts that Debtors have used Elijah’s services throughout the tenure of these Chapter 11 cases. Therefore, Elijah has provided ongoing tangible value to the Debtors’ estates as such services constitute actual, necessary costs and expenses of preserving the estates.

WHEREFORE, Elijah respectfully requests allowance and payment of an administrative expense to Elijah in the amount of not less than \$299,380.47 and reserves its rights to supplement this Administrative Request.

Dated: March 28, 2024

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<sup>2</sup> This request relates to Case No. 23-90715, which is jointly administered. Elijah files this request out of the abundance of caution. As stated in the Notice of (I) Entry of Confirmation Order, (II) Occurrence of Effective Date, and (III) Administrative Claims Bar date [Doc. 1161], administrative expense claims need not be filed for claims that “relate to post-petition ordinary course operations and are set forth in the Reorganized Debtors’ books and records.”

Respectfully submitted,

SPENCER FANE, LLP

By: /s/ Misty A. Segura  
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**CERTIFICATE OF SERVICE**

I certify that on March 28, 2024, a true and correct copy of the foregoing document was served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas and by electronic mail upon the following parties below.

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/s/ Misty A. Segura  
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